

TAYLOR & GRANT

Candies • Chocolates • Food Gifts

asi/90667

151 Weber Street South
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CANADA

April 2, 2003

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852
ATTN: Docket No. 02N-0278

Dear Sir or Madam:

We are aware of the intention of the FDA to require exporters of food shipments to the United States to provide prior notice of the content of those shipments. While we respect the purpose of this regulation we are concerned about its impact on businesses such as our own, which is based on rapid turnaround of custom promotional products. Shipments to the United States are made once per day on a consolidated basis, and the final composition of the daily load is often not known until just prior to its departure from our facility.

Enclosed for reference is a catalogue of our products. It illustrates their scope and variety, and the accelerated delivery times which define the promotional products industry, and which are expected by our customers in the United States. The full production cycle, which must be completed within a few days, includes raw material manufacture, artwork rendering, printing plate production, imprinting, assembly, and packing. We are often completing the final stages of the cycle only a few hours prior to shipment. Thus, the expectation that we would provide advanced notice of shipment content would hamper our efforts to compete effectively in a time-sensitive marketplace.

Our company has been exporting to the United States for ten years, and it has developed a growing presence there with the assistance of several independent sales agencies as well as national and regional distributors. We agree with the purpose of the legislation to ensure the safety of products entering the United States, but we feel that the notification period under consideration would be punitive, and inefficient for Customs purposes. In our view, it would be more constructive to qualify suppliers rather than individual shipments. Standards of supplier certification could be applied consistently on both sides of the border, and they would provide for higher levels of safety of products emanating from points across North America.

Thank you for your consideration.

Yours truly,
TAYLOR & GRANT SPECIALTIES LIMITED


Dundee Staunton,
General Manager

02N-0278

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FOOD AND DRUG ADMINISTRATION
5630 FISHERS LANE, ROOM 1061
ROCKVILLE, MD 20852***